

MISC 14 1247

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

GENTEX CORPORATION,

Plaintiff,

-against-

RONALD ABBOTT, HELICOPTERHELMET.COM
and HELICOPTER HELMET, LLC

Underlying Litigation:
Case No. 12-CV-2549
United States District
Court for the Middle
District of Pennsylvania

----- X

**MOTION TO COMPEL RESPONSE TO SUBPOENA SERVED ON
TRANSAERO, INC.**

Respectfully submitted,

FAUST GOETZ SCHENKER & BLEE

Peter Kreymeyer (7234)
Local counsel for Defendant Ronald Abbott
Two Rector Street, 20th Floor
New York, New York 10006
(212) 363-6900 ext 12
Fax: (212) 363-1090
Our File No.: 13005-SC
Email: pkreymeyer@fgsb.com

LAW OFFICES OF BRUCE J. CHASAN, LLC
Of Counsel for Defendant Ronald Abbott
(Pro Hac Vice application to be submitted)
Bruce J. Chasan (PA I.D. No. 29227)
Two Penn Center – Suite 312
1500 JFK Boulevard
Philadelphia, PA 19102
Phone: (215) 567-4400
Fax: (215) 565-2882
Email: bjchasan@brucechasanlaw.com

ORENSTEIN, M.J.

**MOTION TO COMPEL RESPONSE TO SUBPOENA SERVED ON
TRANSAERO, INC.**

For the reasons set forth in the Memorandum filed herewith, together with Exhibits A-M, Defendant Ronald Abbott ("Abbott"), pursuant to Fed.R.Civ.P. 37(a)(1), respectfully moves the Court for an Order compelling non-party Transaero, Inc. to produce documents and responsive materials, and to furnish complete and appropriate answers, in response to the subpoena served by Abbott.

Respectfully submitted,

FAUST GOETZ SCHENKER & BLEE

Peter Kreymen (7234)
Counsel for Defendant Ronald Abbott
Two Rector Street, 20th Floor
New York, New York 10006
(212) 363-6900 ext 12
Fax: (212) 363-1090
Our File No.: 13005-SC
Email: pkreymen@fgsb.com

LAW OFFICES OF BRUCE J. CHASAN, LLC
Of Counsel for Defendant Ronald Abbott
(Pro Hac Vice application to be submitted)
Bruce J. Chasan (PA I.D. No. 29227)
Two Penn Center – Suite 312
1500 JFK Boulevard
Philadelphia, PA 19102
Phone: (215) 567-4400
Fax: (215) 565-2882
Email: bjchasan@brucechasanlaw.com

DATED: 10-7-14